

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

MDL No. 2419
Master Dkt. 1:13-md-02419-RWZ

THIS DOCUMENT RELATES TO:

All Actions

**NOTICE OF FILING MODIFIED PROPOSED AMENDED QUALIFIED
PROTECTIVE ORDERS CONCERNING PRODUCTION OF CERTAIN
INFORMATION MAINTAINED BY THIRD PARTY PAYORS AND MEDICAID
AGENCIES**

On October 19, 2016, the Plaintiffs' Steering Committee ("PSC") moved this Court for entry of an Amended Qualified Protective Order Concerning the Production of Certain Information Maintained by Third Party Payors and an Amended Qualified Protective Order Concerning Production of Certain Information Maintained By Medicaid Agencies (Dkt. No. 3134, the "Motion".) At the November 2, 2016 Status Conference the Court requested that the PSC and counsel for certain Clinic Defendants meet and confer on resolution of the Motion. The meet and confer process is now completed and the PSC files the newly modified proposed qualified protective orders, which those Clinic Defendants have indicated they do not oppose. Accordingly, the PSC respectfully requests the Court grant the Motion and enter the amended qualified protective orders attached to this Notice as opposed to the proposed qualified protective orders filed with the Motion.

Dated: November 11, 2016

Respectfully submitted,

/s/ Benjamin A. Gastel

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Plaintiffs' Steering Committee

CERTIFICATE OF SERVICE

I, Benjamin A. Gastel, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: November 11, 2016

/s/ Benjamin A. Gastel
Benjamin A. Gastel